

IN THE UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

UNITED STATES OF AMERICA

v.

PAULETTE MARTIN, et al.

No. 07-4060

No. 07-4059 (L)

* * * * *

MOTION FOR LEAVE TO FILE OVERSIZED BRIEF

Come now Appellant herein, Paulette Martin, by and through her counsel, Michael D. Montemarano, Esq., and Michael D. Montemarano, P.A., as appointed counsel pursuant to the CJA, and on behalf of the other Appellants herein, and does move for leave to file an oversized Joint Brief of Appellants, and in support thereof does state:

1. Counsel for the six Appellants have elucidated not fewer than sixteen (16) separate issues which they believe should be raised in this matter. Certain of these issues have been adopted by multiple Appellants

2. Such a representation is not made lightly, as counsel for Appellants have considerable experience in these matters. In addition, it will be recollected that this appeal arises from a trial indictment charging over sixty counts, and a trial that lasted twelve weeks.

3. Furthermore, counsel for the several Appellants also require additional space both to describe adequately and to preserve properly the record regarding issues arising from such a lengthy record.

4. Appellants therefore respectfully request the enlargement of the length of the Joint Brief of Appellants from 14,000 words to 39,920 words.

5. Counsel for Appellants is authorized to state that counsel for Appellee consents to the grant of the requested relief.

Respectfully submitted,

March 9, 2011

/s/
MICHAEL D. MONTEMARANO

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For Appellant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on or before this 9th day of March, 2011, a copy of the foregoing *Motion For Leave to File an Oversized Brief* was filed via CM-ECF, and served via direct email, on Daniel Goodman, Esq., US Department of Justice, Criminal Appellate Section, 1264 Main Building, 950 Pennsylvania Avenue, NW, Washington, DC 20530.

/s/
MICHAEL D. MONTEMARANO